

# EXHIBIT G

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

May 18, 2016

9:04 a.m.

C O N F I D E N T I A L

Deposition of JOHANNA SJOBERG, pursuant  
to notice, taken by Plaintiff, at the  
offices of Boies Schiller & Flexner, 401  
Las Olas Boulevard, Fort Lauderdale, Florida,  
before Kelli Ann Willis, a Registered  
Professional Reporter, Certified Realtime  
Reporter and Notary Public within and  
for the State of Florida.

1 Q. Okay. Great.

2 All right. Do you know a female by the  
3 name of Ghislaine Maxwell?

4 A. Yes.

5 Q. And when did you first meet Ms. Maxwell?

6 A. 2001. March probably. End of  
7 February/beginning of March.

8 Q. And how did you meet her?

9 A. She approached me while I was on campus at  
10 Palm Beach Atlantic College.

11 Q. And what happened when she approached you?

12 A. She asked me if I could tell her how to  
13 find someone that would come and work at her house.  
14 She wanted to know if there was, like, a bulletin  
15 board or something that she could post, that she was  
16 looking for someone to hire.

17 Q. And what did you discuss with her?

18 A. I told her where she could go to -- you  
19 know, to put up a listing. And then she asked me if  
20 I knew anyone that would be interested in working  
21 for her.

22 Q. Did she describe what that work was going  
23 to be?

24 A. She explained that she lived in Palm Beach  
25 and didn't want butlers because they're too stuffy.

1 And so she just liked to hire girls to work at the  
2 house, answer phones, get drinks, do the job a  
3 butler would do.

4 Q. And did she tell you what she would pay  
5 for that kind of a job?

6 A. At that moment, no, but later in the day,  
7 yes.

8 Q. And what did she say?

9 A. Twenty dollars an hour.

10 Q. Was there anybody else with Ms. Maxwell  
11 when you met her?

12 A. There was another woman with her. I don't  
13 recall her or what she looks like or how old she  
14 was.

15 Q. And what happened next?

16 A. And then she asked me if I would be  
17 interested in working for her. And she told me that  
18 she was -- I could trust her and that I could jump  
19 in her car and go check out the house at that moment  
20 if I wanted.

21 And so I said, Sure, let's do it, and went  
22 to her home with her.

23 Q. And where was that home?

24 A. In Palm Beach.

25 Q. And did she describe that home as being

1 magazines.

2 She and I went -- she wanted to take me  
3 shopping to Worth Avenue, but it was a Sunday and  
4 Nieman Marcus was closed, so we went back to, like,  
5 a little book store. And I remember she bought, I  
6 think, five pairs of reading glasses because she  
7 thought Jeffrey would like them. He had them all  
8 over the house. On every table there was reading  
9 glasses.

10 And that's about it. It was a pretty  
11 simple day.

12 Q. Were you paid that day for that work?

13 A. Yes.

14 Q. And how much were you paid? Do you  
15 remember?

16 A. I don't remember how many hours I was  
17 there -- I was there. She paid me cash.

18 Q. So Maxwell paid you?

19 A. Yes.

20 Q. And then was she the one who trained you  
21 with what -- with respect to what you were supposed  
22 to do during the day, directed you to, like you  
23 said, go to --

24 A. I believe she was the one that was kind of  
25 showing me around.

1 Q. And how long did you work in that position  
2 answering phones and doing --

3 A. Just that one day.

4 Q. Just that one day.

5 And did your duties change?

6 A. Well, the next time she called me, she  
7 asked me if I wanted to come over and make \$100 an  
8 hour rubbing feet.

9 Q. And what did you think of that offer?

10 A. I thought it was fantastic.

11 Q. And did you come over to the house for  
12 that purpose?

13 A. Yes.

14 Q. And when you came over to the house, was  
15 Maxwell present?

16 A. I don't recall.

17 Q. And what happened that second time you  
18 came to the house?

19 A. At that point, I met Emmy Taylor, and she  
20 took me up to Jeffrey's bathroom and he was present.  
21 And her and I both massaged Jeffrey. She was  
22 showing me how to massage.

23 And then she -- he took -- he got off the  
24 table, she got on the table. She took off her  
25 clothes, got on the table, and then he was showing

1 me moves that he liked. And then I took my clothes  
2 off. They asked me to get on the table so I could  
3 feel it. Then they both massaged me.

4 Q. So it was more than a foot massage at that  
5 point?

6 A. Yeah, it was mostly, like, legs and back.

7 Q. Was everybody in the room without clothes  
8 on?

9 A. When they were on the massage table, yes.

10 Q. Did they -- when they got off the massage  
11 table to perform the massage, did they dress or  
12 did --

13 A. Yes.

14 Q. They dressed.

15 And do you recall who paid you for that  
16 first day that you did the massages?

17 A. I don't recall.

18 Q. Do you recall whether Maxwell was at the  
19 house during that first day when you were doing the  
20 massage with Emmy and Jeffrey?

21 MS. MENNINGER: Objection, asked and  
22 answered.

23 BY MS. McCAWLEY:

24 Q. You can answer.

25 A. I don't recall.

1 Q. Who did Emmy work for?

2 A. Ghislaine.

3 Q. Did Maxwell ever refer to Emmy by any  
4 particular term?

5 A. She called her her slave.

6 Q. You said your job duties changed. Did you  
7 start to travel as part of your job with Jeffrey and  
8 Ghislaine?

9 A. Yes. The next time they called me, they  
10 asked me to go to New York.

11 Q. And did you -- do you recall when that was  
12 approximately?

13 A. That was Easter of 2001.

14 Q. And do you recall who was on the plane  
15 with you for that trip?

16 MS. MENNINGER: Objection, leading, form.

17 MS. McCAWLEY: Actually, I'm going to stop  
18 really quickly and I'm going to ask for the  
19 next exhibit, please.

20 MS. MENNINGER: This is 3?

21 MS. McCAWLEY: Yes. I'm going to mark  
22 this as Exhibit 3 for purposes of the  
23 deposition.

24

25



1 leading.

2 THE WITNESS: Jeffrey Epstein; Ghislaine  
3 Maxwell; AP and PK are the two women I do not  
4 recall; Virginia Roberts; and myself.

5 BY MS. McCAWLEY:

6 Q. Do you recall how you flew back from the  
7 location in the US Virgin Islands?

8 A. They put me on a commercial flight. I  
9 wanted to be home in time for Easter.

10 Q. When you say "they," do you recall who  
11 made those arrangements for you?

12 A. It could have been Ghislaine.

13 Q. Did you -- do you recall performing  
14 massages while you were in the US Virgin Islands?

15 A. Yes.

16 Q. Who was involved in -- was there more than  
17 one?

18 A. Yes. I massaged Ghislaine at one point.  
19 And I massaged Jeffrey, Virginia and I, both, on the  
20 beach.

21 Q. Were you dressed during the massage that  
22 was on the beach?

23 A. Yes. Bikinis probably, most likely.

24 Q. Do you recall what Virginia was wearing?

25 A. I believe she was wearing a bathing suit,

1 to object and then you can still answer. No  
2 one is going to stop you from answering. I  
3 just need to get the objection on the record,  
4 in the same way she needs to be able to talk  
5 before you. My apologies. I'm not trying to  
6 cut you off, but I am supposed to get it in  
7 before you answer.

8 BY MS. McCAWLEY:

9 Q. Did Jeffrey ever tell you why he received  
10 so many massages from so many different girls?

11 MS. MENNINGER: Objection, hearsay.

12 BY MS. McCAWLEY:

13 Q. You can answer.

14 A. He explained to me that, in his opinion,  
15 he needed to have three orgasms a day. It was  
16 biological, like eating.

17 Q. And what was your reaction to that  
18 statement?

19 A. I thought it was a little crazy.

20 Q. And what did -- do you recall what -- when  
21 you observed the other females giving massages, do  
22 you recall what they would dress like? Did they  
23 wear scrubs or did they typically wear normal  
24 clothes?

25 A. Normal clothes.

1 MS. MENNINGER: Objection, leading.

2 BY MS. MCCAWLEY:

3 Q. Do you believe that from your  
4 observations, Maxwell and Epstein were boyfriend and  
5 girlfriend?

6 A. Initially, yes.

7 Q. Did Maxwell ever share with you whether it  
8 bothered her that Jeffrey had so many girls around?

9 MS. MENNINGER: Objection, leading,  
10 hearsay.

11 THE WITNESS: No. Actually, the opposite.

12 BY MS. MCCAWLEY:

13 Q. What did she say?

14 A. She let me know that she was -- she would  
15 not be able to please him as much as he needed and  
16 that is why there were other girls around.

17 Q. Did there ever come a time -- did you ever  
18 take a photography class in school?

19 A. Yes.

20 Q. And did there ever come a time when  
21 Maxwell offered to buy you a camera?

22 A. Yes.

23 MS. MENNINGER: Objection, leading.

24 BY MS. MCCAWLEY:

25 Q. Did Maxwell ever offer to buy you a

1 camera?

2 MS. MENNINGER: Objection, leading.

3 THE WITNESS: Yes.

4 BY MS. McCAWLEY:

5 Q. Was there anything you were supposed to do  
6 in order to get the camera?

7 MS. MENNINGER: Objection, leading.

8 THE WITNESS: I did not know that there  
9 were expectations of me to get the camera until  
10 after. She had purchased the camera for me,  
11 and I was over there giving Jeffrey a massage.  
12 I did not know that she was in possession of  
13 the camera until later.

14 She told me -- called me after I had left  
15 and said, I have the camera for you, but you  
16 cannot receive it yet because you came here and  
17 didn't finish your job and I had to finish it  
18 for you.

19 BY MS. McCAWLEY:

20 Q. And did you -- what did you understand her  
21 to mean?

22 A. She was implying that I did not get  
23 Jeffrey off, and so she had to do it.

24 Q. And when you say "get Jeffrey off," do you  
25 mean bring him to orgasm?

1 A. Yes.

2 Q. Did Ghislaine ever describe to you what  
3 types of girls Jeffrey liked?

4 A. Model types.

5 Q. Did Ghislaine ever talk to you about how  
6 you should act around Jeffrey?

7 A. She just had a conversation with me that I  
8 should always act grateful.

9 Q. Did Jeffrey ever tell you that he took a  
10 girl's virginity?

11 A. He did not tell me. He told a friend of  
12 mine.

13 Q. And what do you recall about that?

14 MS. MENNINGER: Objection, hearsay,  
15 foundation.

16 THE WITNESS: He wanted to have a friend  
17 of mine come out who was cardio-kickboxer  
18 instructor. She was a physical trainer.

19 And so I brought her over to the house,  
20 and he told my friend Rachel that -- he said,  
21 You see that girl over there laying by the  
22 pool? She was 19. And he said, I just took  
23 her virginity. And my friend Rachel was  
24 mortified.

25

1 BY MS. McCAWLEY:

2 Q. Based on what you knew, did Maxwell know  
3 that the type of massages Jeffrey was getting  
4 typically involved sexual acts?

5 MS. MENNINGER: Objection, foundation,  
6 leading.

7 THE WITNESS: Yes.

8 BY MS. McCAWLEY:

9 Q. What was Maxwell's main job with respect  
10 to Jeffrey?

11 MS. MENNINGER: Objection, foundation.

12 THE WITNESS: Well, beyond companionship,  
13 her job, as it related to me, was to find other  
14 girls that would perform massages for him and  
15 herself.

16 BY MS. McCAWLEY:

17 Q. Did Maxwell ever refer to the girls in a  
18 particular way?

19 A. At one point when we were in the islands,  
20 we were all watching a movie and she called us her  
21 children.

22 Q. Did anybody respond to that?

23 A. I don't recall.

24 Q. Did she ever refer to herself as a mother?

25 A. Yes, like a mother hen.

1 Q. Do you remember anything notable about the  
2 phone calls?

3 A. I just remember I always had to say, He's  
4 unavailable, can I take a message?

5 Q. And where did you take a message?

6 A. On a little notepad next to the phone.

7 Q. Do you recall any small children calling  
8 the house that day?

9 A. No.

10 Q. Were you speaking to anyone about their  
11 school experience or anything like that?

12 A. No.

13 Q. Did you take any messages for famous  
14 people?

15 A. They could have been famous and I would  
16 have been clueless.

17 Q. Did you take messages at any other point  
18 during the time that you worked with Jeffrey?

19 A. No.

20 Q. And you said you remember at the end of  
21 that day being paid by Ghislaine?

22 A. Yes.

23 Q. And you were paid for doing the errands  
24 and answering phones and whatever else you did?

25 A. Yes.

1 Q. When you came upstairs, where was Virginia  
2 sitting?

3 A. I don't remember.

4 Q. Do you remember what she was wearing?

5 A. No.

6 Q. She was already there when you got back  
7 from sightseeing?

8 A. Yes.

9 Q. Tell me what happened with the caricature.

10 A. Ghislaine asked me to come to a closet.  
11 She just said, Come with me. We went to a closet  
12 and grabbed the puppet, the puppet of Prince Andrew.  
13 And I knew it was Prince Andrew because I had  
14 recognized him as a person. I didn't know who he  
15 was.

16 And so when I saw the tag that said Prince  
17 Andrew, then it clicked. I'm like, that's who it  
18 is.

19 And we went down -- back down to the  
20 living room, and she brought it in. It was just  
21 funny because -- he thought it was funny because it  
22 was him.

23 Q. Tell me how it came to be that there was a  
24 picture taken.

25 MS. McCAWLEY: Objection.



1 THE WITNESS: I just remember someone  
2 suggesting a photo, and they told us to go get  
3 on the couch. And so Andrew and Virginia sat  
4 on the couch, and they put the puppet, the  
5 puppet on her lap.

6 And so then I sat on Andrew's lap, and I  
7 believe on my own volition, and they took the  
8 puppet's hands and put it on Virginia's breast,  
9 and so Andrew put his on mine.

10 BY MS. MENNINGER:

11 Q. And this was done in a joking manner?

12 MS. McCAWLEY: Objection.

13 THE WITNESS: Yes.

14 BY MS. MENNINGER:

15 Q. Do you recall a photo being taken of that  
16 event?

17 A. Yes.

18 Q. You've never seen the photo?

19 A. No.

20 Q. You don't know whose camera it was?

21 A. No.

22 Q. Virginia was sitting on the couch next to  
23 Andrew, not in a big leather armchair?

24 A. Maybe. I'm just trying to remember how I  
25 remember it.

1 exposed her bra, and she grabbed it and pulled it  
2 down.

3 Q. Anything else?

4 A. That was the conversation that he had told  
5 her that he had taken this girl's virginity, the  
6 girl by the pool.

7 Q. Okay. Did Maxwell ever say to you that it  
8 takes the pressure off of her to have other girls  
9 around?

10 A. She implied that, yes.

11 Q. In what way?

12 A. Sexually.

13 Q. And earlier Laura asked you, I believe, if  
14 Maxwell ever asked you to perform any sexual acts,  
15 and I believe your testimony was no, but then you  
16 also previously stated that during the camera  
17 incident that Maxwell had talked to you about not  
18 finishing the job.

19 Did you understand "not finishing the job"  
20 meaning bringing Jeffrey to orgasm?

21 MS. MENNINGER: Objection, leading, form.

22 BY MS. McCAWLEY:

23 Q. I'm sorry, Johanna, let me correct that  
24 question.

25 What did you understand Maxwell to mean

1 when she said you hadn't finished the job, with  
2 respect to the camera?

3 MS. MENNINGER: Objection, leading, form.

4 THE WITNESS: She implied that I had not  
5 brought him to orgasm.

6 BY MS. McCAWLEY:

7 Q. So is it fair to say that Maxwell expected  
8 you to perform sexual acts when you were massaging  
9 Jeffrey?

10 MS. MENNINGER: Objection, leading, form,  
11 foundation.

12 THE WITNESS: I can answer?

13 Yes, I took that conversation to mean that  
14 is what was expected of me.

15 BY MS. McCAWLEY:

16 Q. And then you mentioned, I believe, when  
17 you were testifying earlier that Jeffrey told you a  
18 story about sex on the plane. What was that about?

19 MS. MENNINGER: Objection, hearsay.

20 THE WITNESS: He told me one time Emmy was  
21 sleeping on the plane, and they were getting  
22 ready to land. And he went and woke her up,  
23 and she thought that meant he wanted a blow  
24 job, so she started to unzip his pants, and he  
25 said, No, no, no, you just have to be awake for

1 A. No.

2 Q. Was it in the context of anything?

3 A. About the camera that she had bought for  
4 me.

5 Q. What did she say in relationship to the  
6 camera that she bought for you and taking  
7 photographs of you?

8 A. Just that Jeffrey would like to have some  
9 photos of me, and she asked me to take photos of  
10 myself.

11 Q. What did you say?

12 A. I don't remember saying no, but I never  
13 ended up following through. I think I tried once.

14 Q. This was the pre-selfie era, correct?

15 A. Exactly.

16 Q. I want to go back to this: You testified  
17 to two things just now with Sigrid that you said  
18 were implied to you.

19 A. Okay.

20 Q. The first one was it would take pressure  
21 off of Maxwell to have more girls around?

22 A. Right.

23 Q. What exactly did Maxwell say to you that  
24 led you to believe that was her implication?

25 A. She said she doesn't have the time or

1

2

C E R T I F I C A T E

3

STATE OF FLORIDA )

: ss

4

COUNTY OF MIAMI-DADE )

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I, KELLI ANN WILLIS, a Registered  
Professional, Certified Realtime Reporter and  
Notary Public within and for The State of  
Florida, do hereby certify:

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That JOHANNA SJOBERG, the witness whose  
deposition is hereinbefore set forth was duly  
sworn by me and that such Deposition is a true  
record of the testimony given by the witness.

13

14

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16

I further certify that I am not related  
to any of the parties to this action by blood  
or marriage, and that I am in no way interested  
in the outcome of this matter.

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IN WITNESS WHEREOF, I have hereunto set  
my hand this 18th day of May, 2016.

\_\_\_\_\_  
KELLI ANN WILLIS, RPR, CRR

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